

PROJECT
INSTRUCTION

Sargent & Lundy

INSTRUCTION PI-MP3-08
REV. 1

Client: Northeast Utilities

Station: Millstone Unit 3

Title: ICAVP TEAM PERSONNEL SUBSTITUTION AND/OR ADDITION

☒ Safety-Related

☐ Non-Safety-Related


Reviewed By:

Approved By:

System Lead	Programmatic Lead	O&M Lead	Accident Mitigation Lead	QA Engineer	Internal Review Committee Chairman	Verification Team Manager
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Description						

Rev. 1

- Deleted use of S&L Objectivity Questionnaire and referenced NRC Conflict of Interest Statement.
- Required NRC interview of additional or substituted personnel.

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1.0 PURPOSE

This instruction establishes the requirements for the substitution and addition of personnel to the ICAVP Project Team. The selection of personnel for the ICAVP was based on their qualifications to perform the assigned reviews, their financial and technical independence from the Unit being reviewed, and NRC acceptance of the personnel. Substitution of existing personnel on the team may be required as a result of unavoidable circumstances. Addition of personnel may be required to add expertise or manpower to fully investigate issues which are identified during the course of the program.

2.0 REFERENCE

- 2.1 NRC Confirmatory Order Establishing Independent Correction Action Verification Program - Millstone Nuclear Power Station, Units 1,2, and 3
- 2.2 PI-MP3-01, ICAVP Communications Protocol

3.0 DEFINITIONS

- 3.1 **Substitution** - Replacing existing personnel on the ICAVP Project Team which were included in the original proposal for that Unit and which the NRC interviewed and accepted.
- 3.2 **Addition** - Adding personnel to the ICAVP Project Team.
- 3.3 **System Review Group (SRG)** - The subgroup of the ICAVP Verification Team responsible for performing an in-depth review of the design of the systems in the scope of the ICAVP.
- 3.4 **Operations & Maintenance and Testing Review Group (ORG)** - The subgroup of the ICAVP Verification Team responsible for the review of the operating, maintenance and testing procedures, and training manuals for the systems within the scope of the ICAVP.
- 3.5 **Accident Mitigation Review Group (ARG)** - The subgroup of the ICAVP Verification Team responsible for the review of the critical system attributes of the systems used to mitigate the consequences of an accident.

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- 3.6 **Programmatic Review Group (PRG)** - The subgroup of the ICAVP Verification Team responsible for performing a review of the design control and corrective action processes in the scope of the ICAVP.

4.0 **RESPONSIBILITIES**

- 4.1 The Verification Team Manager shall be responsible for the selection of substitute or additional personnel for the ICAVP Project Team.
- 4.2 The individual personnel shall be responsible for completing the NRC's Conflict of Interest Statement.

5.0 **PROCEDURE**

5.1 **Substitution**

The Nuclear Regulatory Commission (NRC) Confirmatory Order referenced in Section 2.0 of this PI requires that the selection of the members of the ICAVP Project Team be subject to NRC staff approval. Prior to the start of the program, the original team will have been approved by the NRC. If for some reason team members cannot fulfill their obligation to the Project Team, the Verification Team Manager shall select replacements for them. The substitute personnel shall have the technical background, education and experience necessary to perform the functions that are required of them by their position on the ICAVP Project Team. They shall also be required to meet the independence criteria established for the original team members. The substitute personnel shall satisfactorily complete the NRC's Conflict of Interest Statement (Attachment 6.1). The Verification Team Manager shall notify the NRC and NU in writing in accordance with the Communications Protocol (PI-MP3-01) that substitutions were made. The Verification Team Manager shall provide the NRC and NU with a copy of the substitute personnel's resumes and a copy of their completed Conflict of Interest Statements (Attachment 6.1). If the NRC notifies S&L that it has unresolvable objections to the qualifications or the independence of the substitute personnel, they shall be suspended from any further work on the ICAVP and all work performed by them shall be reperfomed by acceptable individuals.

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5.2 Addition

Since the specific systems selected for the ICAVP are not known at this time, it is difficult to know exactly the number of engineers in each discipline and the number of specialists that will be needed to implement the ICAVP. In addition, as the program proceeds, specific issues may be identified which need specialized expertise to fully investigate. Or, the size and complexity of the systems chosen for review may be greater than estimated. If any of these situations occur, additional staff may be needed for the Verification Team. In this case, the Verification Manager will select additional personnel for the ICAVP Project Team. Similar to section 5.1 above, the additional personnel shall have the technical background, education and experience necessary to perform the functions that are required of them by their position on the ICAVP Project Team. They shall also be required to meet the independence criteria established for the original team members. The additional personnel shall satisfactorily complete the NRC Conflict of Interest Statement (Attachment 6.1). The Verification Team Manager shall notify the NRC and NU in writing in accordance with the Communications Protocol (PI-MP3-01) that additional personnel are being added to the Project Team. The Verification Team Manager shall provide the NRC and NU with a copy of the additional personnel's resumes and a copy of their completed Conflict of Interest Statements. If the NRC notifies S&L that it has unresolvable objections to the qualifications or the independence of the additional personnel, they shall be suspended from any further work on the ICAVP, and all work performed by them shall be reperformed by acceptable individuals.

6.0 ATTACHMENTS

6.1 NRC Conflict of Interest Statement (2 pages)

CONFLICT-OF-INTEREST STATEMENT

MILLSTONE - Independent Corrective Action Verification Program (ICAVP)

Proposed Consultant

Consultant's Employer

My participation in the Millstone Unit ____ ICAVP [() does () does not] involve situations or relationships in which I had direct previous involvement with activities at the plant that I will be reviewing and I [() have () do not have] conflicting roles that might bias my judgment in relation to my work on the ICAVP. In addition

1. () I have not been previously employed by Northeast Nuclear Energy Company (NNECO) or any of its predecessors.

() I have been previously employed by NNECO or some of its predecessors. (State the nature of the employment.)
2. () I have not previously provided design or engineering services to NNECO for the subject Millstone unit as a contractor or a subcontractor.

() I have previously provided design or engineering services to NNECO for the subject Millstone unit as a contractor or a subcontractor.
3. () I have no other business relations (member of NNECO's Board of Directors, member of an Offsite Review Committee, etc.) with NNECO for the subject Millstone unit that may create the appearance of a conflict of interest.

() I have other business relations with NNECO for the subject Millstone unit that may create the appearance of a conflict of interest.
4. () I have not been previously employed by the subject Millstone unit's architect-engineer (AE) (_____), the nuclear steam supply system (NSSS) vendor (_____), or any of their predecessors associated with design or construction of the subject Millstone unit.

() I have been previously employed by the subject Millstone unit's AE (_____), the NSSS vendor (_____), or one or more of their predecessors associated with design or construction of the subject Millstone unit. (State the nature of the employment.)
5. () I, and my immediate family, do not own or control financial interests (stocks, bonds, mutual funds, etc.) in NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____).

() I, or a member of my immediate family, own or control financial interests (stocks, bonds, mutual funds, etc.) in NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____).

Proposed Consultant

Consultant's Employer

6. ☐ Members of my immediate family are not employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) associated with design or construction of the subject Millstone unit.
- ☐ Members of my immediate family are employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) associated with design or construction of the subject Millstone unit. (State the nature of the employment.)
7. ☐ My close relatives (aunts, uncles, first cousins) are not employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) in a management capacity.
- ☐ My close relatives (aunts, uncles, first cousins) are employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) in a management capacity. (State the nature of the employment.)
8. Have you been promised any additional compensation, reward or anything of value, contingent upon the position you take on any issue being considered by you in connection with the subject Millstone unit ICAVP? If yes, provide a detailed description of the circumstances.
- ☐ NO ☐ YES. Explain.
9. Do you know of any reason, whether or not inquired about in this questionnaire, that would affect your ability to be completely objective in performing any of the tasks assigned to you in connection with the subject Millstone unit's ICAVP? If yes, provide a detailed description of the circumstances.
- ☐ NO ☐ YES. Explain.
10. Are you aware of anything that might create a perception that you would not act with objectivity in performing any of the tasks assigned to you in connection with the subject Millstone unit's ICAVP? If yes, provide a detailed description of the circumstances.
- ☐ NO ☐ Yes. Explain.

I certify that the statements I have made on this form are true, complete, and correct to the best of my knowledge and if the circumstances surrounding the responses change during performance of the ICAVP for the subject Millstone unit, I will inform the NRC of those changes.

Signature

Date

In the above statements, the term "employed" is construed to mean any form of employment, either direct, as a contractor, or as a subcontractor. The term "immediate family" includes the interviewee's children, stepchildren, spouse, parents, stepparents, mother-in-law, father-in-law, brothers-in-law, sisters-in-law, or any person living with the interviewee.